

## MEMORANDUM

Cal/EPA


 CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD  
 CENTRAL VALLEY REGION


Pete Wilson, Governor

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 TO: Rick Woodard  
 CALFED

 FROM: Jerrold A. Bruns, Chief  
 Standards, Policies, Special Studies

DATE: 19 August 1997

SIGNATURE: Jerrold A. Bruns
 SUBJECT: *Comments on Draft CALFED Water Quality Program Component Report*

We have previously provided comments to you on some of the draft chapters that are included in this report. Many of our comments have been addressed in this rewrite. Following are a few additional comments for your consideration.

1. On Page 2-2, there is a listing of water quality issues. The Sacramento River should be included as a source of pesticides entering the Delta.
2. On Page 3-3, there is a statement that pesticides are rarely detected in Delta water samples. This statement is not true. A variety of pesticides are routinely detected in Delta waters. Some pesticides are present at a frequency, duration and magnitude that could be expected to cause adverse impacts to some local aquatic species.
3. Beginning on Page 3-12, there is a discussion of monitoring programs. There is no mention of the monitoring conducted by the Regional Board. Since 1984, the Regional Board has conducted comprehensive monitoring programs on selenium, pesticides, metals and toxicity.
4. On Page 6-3, there is a discussion on wastewater discharges. This section needs to be rewritten. The reference to the Inland Surface Water Plan is wrong. Also, the NPDES program does not regulate discharges from house boats.
5. On Page 7-10, there is an action to reduce toxicity from agricultural pesticides. There should be another bullet under "method" that calls for supporting development and testing management practices to reduce pesticide discharges. The "indicator of success" section should be revised. Improved survival of test organisms in three species toxicity bioassays may be an appropriate interim goal. However, there are other chronic indicators, such as reproduction and growth, that need to be considered. A numerical goal needs to be established for diazinon and chlorpyrifos to provide protection for the entire aquatic community. Table 3.4 includes numerical targets for these two pesticides. These target values should be used as indicators of success or there should be another bullet added to "method" that calls for development of appropriate numerical goals. Targets listed in this table are used as indicators of success for other parameters.

If you have any questions regarding these comments, please call me at 255-3093. Leslie Grober, of our agricultural regulatory unit has also reviewed the draft component report and his comments are being transmitted separately.